

## INFORMATION MEMORANDUM FOR THE RECLAMATION LEADERSHIP TEAM

**DATE:** JANUARY 26, 2016  
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**SUBJECT:** Safety Action Team 1: Roles and Responsibilities.

**CURRENT STATUS:** Team 1 has completed its activities and has developed this conclusions paper that discusses the assigned tasks, outcomes and recommendations.

**BACKGROUND:** Action Team 1 was tasked with developing a common set of SOH roles and responsibilities across Reclamation and ensuring that these roles and responsibilities would be implemented and supported through:

- Standard definitions of duties in position descriptions
- Standard communication of performance expectations in employee performance appraisal plans
- Standard processes for safety related conduct issues

Performance Appraisal Plans. The team engaged in research and discussion with key groups regarding this task. A cursory review of several trades and labor position EPAPs representing five different regions found safety information included in some form, i.e., either in the critical elements and/or the performance standards. The information was not standard across the sample EPAPs and sometimes not written well, but nevertheless included. Additionally, Reclamation has safety procedures and/or requirements outlined in several documents to include, but not limited to Reclamation Safety and Health Standards, Facility Instruction, Standards, and Techniques manuals, Standing Operating Procedures, etc. It is standard practice to follow the safety guidance and processes included in these documents, which often is what is identified in the EPAPs. Guidance from the Office of Personnel Management indicates that safety is not an appropriate stand-alone critical element to evaluate performance. Safety is a subject that is inherent in all positions, i.e., all employees will perform the duties and the responsibilities of their positions in a safe manner. For this reason, developing levels of safeness and then assigning a rating to those levels is not practical. With that being said, some positions in Reclamation, particularly positions in operational settings, are sufficiently involved in safety-related issues that some aspects of safety may be appropriately included within performance elements that are not exclusively focused on safety. In this regard, Team 1 finds the information provided in pages 13-14 of the Team 6 Final Report to be useful and instructive for consideration by supervisors. Of particular note from Team 6 is that, where safety aspects are incorporated by individual supervisors into employee performance standards, they should be based on leading, not lagging indicators (See Team 6 report for more detail). In seeking council on this subject with the Department's Solicitors Office, the opinion provided was very clear that safety is primarily a conduct issue and violations of safety processes and procedures should be addressed through the employee discipline system, not through the performance system. As a result, development of standard, stand-alone critical elements was not pursued. Supervisors should nonetheless assess their employees' work situations to determine whether some aspects of safety are appropriately included in performance elements as described by Team 6.

Position Descriptions. Team 1 members and other staff met with the Reclamation Partnership Council and the regional HR Officers to discuss the SOH Action Plan requirements and the plan to incorporate the three safety paragraphs into all existing and future PDs. The conclusion of these discussions was that neither entity recommended adding the safety paragraphs to PDs. It was argued that most PDs where safety is a significant component of the job already include a statement that

employees are required to follow all safety precautions as a regular and recurring part of their duties. Amending the PDs would add no useful information. As a result of these and further discussions within the team, Team 1 concludes that the inclusion of standard paragraphs in the PDs would not enhance the safety of the work environment, but rather could be a distraction from efforts that actually would impact safety performance.

Safety-Related Conduct Issues. Based on Team 1's review of DOI's Table of Penalties guidance, it concluded that adequate guidance is already in place for safety-related conduct issues.

The conclusions in these three areas led to a re-assessment of how safety related roles and responsibilities should be defined. In doing so, the conclusions of Action Team 16 were highly instructive. Team 16 concluded that the specific role of SOH professionals in facility reviews was not adequately defined in either existing facility review guidance or SOH guidance, and that the existing D&S covering the Safety Program was focused primarily on qualifications of the personnel involved, rather than on the scope of their reviews and an oversight mechanism for ensuring that deficiencies are addressed in a timely manner.

**KEY POINTS:** Standard language for Position Descriptions and Performance Standards across Reclamation are not the appropriate course of action for addressing safety roles and responsibilities. The analyses and recommendations by many of the Safety Action Plan teams address roles and responsibilities in their respective areas. A few specific recommendations follow, but the larger point is that SSLE will need to take the results of all of the action teams and use these to articulate overall roles and responsibilities for Reclamation's Safety Program.

- The Safety and Occupation Health Program in SSLE should, working with the Facilities O&M Team and the Power Managers, develop revised guidance in the Reclamation Manual that clearly defines:
  - the respective roles of SOH professionals and engineering/technical staff in facility reviews, in line with the recommendations of Team 16;
  - the scope of review at these facilities, to include review of specific work processes and a detailed review checklist;
  - a consistent method for tracking safety recommendations in a standard Reclamation-wide database, as recommended by Team 12;
  - a Reclamation-wide oversight program implemented by the Safety and Occupation Health Program Office in SSLE, similar to that used for facility review, including internal controls designed to ensure consistent implementation of the D&S requirements and timely completion of recommendations related to facility safety deficiencies, as recommended by Team 12.
- Supervisors should consider the guidance provided in Team 6's final report in determining whether their employees' performance standards should include aspects of safety, and where such aspects are appropriate, they should be based on leading, rather than lagging indicators.